

SueSteib.041306

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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

OLIVIA Y., ET AL.

PLAINTIFFS

VERSUS

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, ET AL.

DEFENDANTS

DEPOSITION OF DR. SUE STEIB

Deposition Taken at the Instance of Plaintiffs  
In the Offices of Bradley, Arant, Rose & White  
Jackson, Mississippi  
On April 13, 2006  
Commencing at 8:45 a.m.

REPORTED BY: CHERIE G. BOND, RMR  
Mississippi CSR #1012

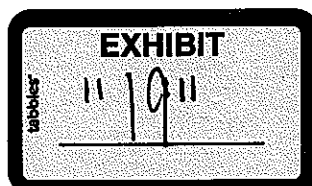
BOND & ASSOCIATES  
107 Mill Creek Corners, Suite C  
Brandon, Mississippi 39047  
(601) 936-4466

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APPEARANCES:

MS. SUSAN LAMBAISE  
Children's Rights  
330 7th Avenue, Fourth Floor  
New York, New York 10001

REPRESENTING PLAINTIFFS  
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6 Q -- in Georgia, in New Jersey?

7 A CWLA has been contracted with states in  
8 relation to lawsuits.

9 Q To provide expert testimony for the states?

10 A I know that they have provided expert  
11 testimony.

12 Q Okay. And is it your understanding that  
13 they have used in fact case record reviews as part of  
14 that work, that expert work, in defending lawsuits?

15 A I know that there have been case record  
16 reviews done. But -- I'm not privy to the -- I don't  
17 know about the connection between the case record  
18 review and the testimony.

19 Q Well, the case record review as part of  
20 expert work for a state undergoing a lawsuit.

21 MS. RACHAL: Objection to form.

22 BY MS. LAMBIASE:

23 Q I'll correct it and ask the question more  
24 clearly. You're aware that CWLA has provided expert  
25 work for systems where there have been class action  
26 lawsuits and part of that work has been case record  
27 reviews to defend those lawsuits?

28 A Yes.

29 Q Okay. Georgia is one example. Do you know  
30 of that example?

31 A I know of that example.

32 Q Okay. And, in fact, Charlene Ingram was one  
33 of the people who you worked with on this case in  
34 Mississippi. Right?

35 A Correct.

36 Q And she worked on one of the case record

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12 reviews in Georgia. Did you know that?

13 A That's correct.

14 Q Okay.

15 MS. LAMBIASE: Off the record.

16 (Off Record)

17 MS. LAMBIASE: Ms. Steib, I'd like to talk  
18 about your contract for a second so I'm going to hand  
19 the court reporter a copy of what I believe to be your  
20 contract. It's Bates Number Steib 000028 through 34  
21 and ask that we mark it as 174.

22 (Exhibit 174 marked)

23 BY MS. LAMBIASE:

24 Q Do you have it in front of you?

25 A Yes.

25

1 Q Do you recognize what has been marked as  
2 Exhibit 174?

3 A Yes.

4 Q Is that your contract with Mississippi  
5 Department of Human Services, Department of Children  
6 and Family Services?

7 A No.

8 Q It's not -- that's not the contract?

9 A It is our contract, but our contract was  
10 with the Attorney General.

11 Q Okay. Okay. Thank you for clarifying that.  
12 I appreciate that. So this is the copy of the  
13 contract of the work to be performed by CWLA for the  
14 State of Mississippi. Is that correct?

15 A It would appear to be.

16 Q This is what we got just for your  
17 edification from the documents produced I guess from  
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18 your files.

19 A Correct.

20 Q And I'll note just for the record that the  
21 last page has Shay Bilchik the former president of  
22 CWLA -- is that correct -- who signed it?

23 A He's still the president.

24 Q I'm sorry. He's still the president.

25 Thank. But I don't have a copy with the Attorney 26

1 General's office signature. But their is the copy  
2 that was in your files. Is that correct?

3 A That's correct.

4 Q So this was the -- this was a contract  
5 between and you the AG, your organization and the  
6 Attorney General's office of the State of Mississippi.

7 A Yes.

8 Q Okay. Can you describe the work that was  
9 contracted to be performed under this contract?

10 A We were asked to review the policies and the  
11 procedures and the organization of DFCS.

12 Q Okay.

13 A And with a particular focus on workload.

14 Q Okay. So the way it was presented to CWLA  
15 was there a request to particularly emphasize  
16 workload.

17 A Correct.

18 Q Okay. And how did that contact come about  
19 as much as you know?

20 A The initial contact was with -- was with Bob  
21 McKeagney as the CWLA representative, but I'm not sure  
22 with whom he had contact.

23 Q Okay. Do you know whether it was somebody  
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